

EXHIBIT 7

From: Koss, Kelly <Kelly.Koss@btlaw.com>
Sent: Tuesday, December 6, 2022 7:51 AM
To: Seth Jaffe; Dreher, Kevin
Cc: Robert D. Anderle; Drew Block; Carole Bos; Brent J. Graber; Stephanie Brochert; Charles Browning; Caffrey, Anthony F. III; Centner, David W.; Brian C. Coffey; Denton, Charles; Dreher, Kevin; Glazier, Bradley K.; Daniel F. Gourash; Hinton, Haley; Jennifer Hansen; Wayne S. Karbal; Kyureghian, Alice; Madden, Christopher; Michelle Miner; Moyer, Bradford S.; Newman, Jason T.; Paglia, Olivia M.; Richard McDermott; Sallah, Anthony; Upton, Caroline; Wilhoit, Kathryn; Winters, Patrick E.; Dilday Miller, Kelsey
Subject: RE: Wolverine World Wide, Inc. v. The American Ins. Co., et al.

Seth:

Wolverine does not agree with your request. As you are aware, North River, First State and AIC do not have standing concerning the Chubb insurers' Second Set of Phase I interrogatories or the Chubb Insurers' Third Set of Phase II Interrogatories, as Chubb was the sole party to propound these interrogatories. Under Federal Rule of Civil Procedure 37(a)(2)(B) "[o]nly 'the discovering party,' . . . may bring a motion to compel a response to specific interrogatories, requests for production, and the like." *Payne v. Exxon Corp.*, 121 F.3d 503, 509–10 (9th Cir. 1997). Federal case law, including a factually similar case from the Eastern District of Michigan makes it clear that only the party propounding the interrogatories and the party that moved to compel responses has any standing to seek the relief you now request. *Phoenix Life Ins. Co. v. Raider-Dennis Agency, Inc.*, No. 07-CV-15324, 2010 WL 839416, at *1 (E.D. Mich. Mar. 4, 2010). Accordingly, Wolverine will not acquiesce to your baseless request.

Best,
 Kelly

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From: Seth Jaffe <sjafe@hww-law.com>
Sent: Monday, December 5, 2022 2:52 PM
To: Dreher, Kevin <KDreher@btlaw.com>
Cc: Anderle, Robert D. <rdanderle@sseg-law.com>; Block, Drew <dblock@plunkettcooney.com>; Bos, Carole <cbos@bosglazier.com>; Brent J Graber <bgrab@hww-law.com>; Brochert, Stephanie <sbrochert@plunkettcooney.com>; Browning, Charles W. <cbrowning@plunkettcooney.com>; Caffrey, Anthony F. III <acaffrey@cardellilaw.com>; Centner, David W. <dcen@clarkhill.com>; Coffey, Brian C. <brian.coffey@mclolaw.com>; Denton, Charles <Charles.Denton@btlaw.com>; Dreher, Kevin <KDreher@btlaw.com>; Glazier, Bradley K. <bglazier@bosglazier.com>; Gourash, Daniel F. <dfgourash@sseg-law.com>; Hemmer, Andrew <Andrew.Hemmer@btlaw.com>; Hinton, Haley <Haley.Hinton@btlaw.com>; Jennifer Hansen <jhansen@hww-law.com>; Karbal, Wayne S. <wkarbal@karballaw.com>; Koss, Kelly <Kelly.Koss@btlaw.com>; Kyureghian, Alice <AKyureghian@btlaw.com>; Madden, Christopher <christopher.madden@mclolaw.com>; Miner, Michelle A. <mminer@karballaw.com>; Moyer, Bradford S. <bmoer@plunkettcooney.com>; Newman, Jason T. <jnewman@cardellilaw.com>; Paglia, Olivia M. <opaglia@plunkettcooney.com>; Richard McDermott

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Subject: [EXTERNAL]RE: Wolverine World Wide, Inc. v. The American Ins. Co., et al.

Kevin:

I am following up on my email below. Please provide Wolverine's response in advance of tomorrow's status conference.

Best regards,

Seth M. Jaffe

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Sent: Thursday, December 1, 2022 3:33 PM

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Subject: Wolverine World Wide, Inc. v. The American Ins. Co., et al.

Kevin:

In light of Wolverine's settlement in principle with the Chubb insurers, we request that Wolverine agree to stipulate that the Chubb insurers' Second Set of Phase I interrogatories and Third Set of Phase II Interrogatories were served on behalf of all defendants and that the Special Master's 11/3/22 ruling on the Chubb insurers' motion to compel is still applicable. As you know, from the outset of this case the insurers were advised to avoid serving duplicative discovery on Wolverine where possible, which the other insurers, including North River, did in this particular instance by not issuing their own interrogatories identical to those served by the Chubb insurers. Requiring North River and other insurers to re-issue the same discovery requests and engage in the same process simply because Wolverine has reached a settlement with the Chubb insurers would serve no purpose other than delay.

We look forward to your response.

Best regards,

Seth M. Jaffe

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